

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>RAYMOND JAMES &amp; ASSOCIATES, INC.,</b>	)	<b>Case No.:</b> <u>1:25-cv-10</u>
	)	
	)	
<b>TIMOTHY VANBENTHUYSEN,</b>	)	
	)	
<b>RICHARD REDVANLY,</b>	)	<b>VERIFIED COMPLAINT</b>
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>vs.</b>	)	
	)	
<b>PAUL T. SABA, JR.,</b>	)	
	)	
<b>Defendant.</b>		

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Come now the Plaintiffs, Raymond James & Associates, Inc. (“Raymond James”), Timothy VanBenthuyesen, and Richard Redvanly (hereinafter, collectively, “Plaintiff”), by and through undersigned counsel, and hereby state causes of action for relief in their Verified Complaint against Defendant Paul T. Saba, Jr. Concurrent with submission of their initial pleading, Plaintiffs are also submitting a Motion for Temporary Restraining Order and for Preliminary Injunction. In support of their Verified Complaint, Plaintiffs hereby state as follows.

**I. INTRODUCTION**

1. This civil action has been filed to prevent ongoing defamation and extreme online harassment and disparagement by Defendant Paul T. Saba, Jr. against Plaintiff Raymond James & Associates, Inc. and two of its employees, Plaintiffs Timothy VanBenthuyesen and Richard Redvanly.

2. From at least November 4, 2024 until at least January 6, 2025, Plaintiffs have been victims of an insidious, repugnant, and wide-reaching cyber-harassment campaign (the “Campaign”) that spread false and malicious information about Plaintiffs through fictitious email accounts.
3. These emails were sent to hundreds of individuals in the same social and professional circles as Messrs. VanBenthuyzen and Redvanly, as well as to employees, business partners, clients, competitors, and/or prospective clients of Raymond James.
4. In many instances, the email accounts used by the perpetrator to spread the false and damaging information were created by the perpetrator to specifically target and/or impersonate Messrs. VanBenthuyzen and Redvanly, as well as their significant others.
5. The perpetrator has tried to wage this horrendous Campaign anonymously by using fictitious email accounts to hide his identity in an effort to spread false and damaging information without consequences.
6. But Raymond James’ Cyber Threat Center in its Office of Information Security (the “RJ Cyber Threat Center”) has been monitoring and working to identify the perpetrator of this malicious campaign.
7. Very recently, the RJ Cyber Threat Center was able to identify information linking at least four of these malicious emails to the Defendant who recently worked as a summer intern for Raymond James & Associates, Inc. in its Atlanta office from June 2024 to August 2024. At the conclusion of that internship, Defendant was notified

that he would not be receiving a full-time offer of employment with Raymond James.

8. Based on the totality of this information, it is almost certain that Defendant is responsible for, and the perpetrator of, the Campaign from its inception on at least November 4, 2024.
9. Notably, the Campaign recently escalated in terms of the volume of malicious emails with at least one malicious email being sent by Defendant on December 30, 2024, January 3, 2025, and January 6, 2025. However, Plaintiffs are not aware of any emails being sent after January 6, 2025, at 5:44 pm Eastern Time – when Raymond James sent Defendant a cease-and-desist letter and Defendant thus realized that Raymond James had connected him to the Campaign.
10. The false and damaging email harassment campaign has caused significant injury to Plaintiffs, including damage to the personal and professional reputations of Messrs. VanBenthuyzen and Redvanly, emotional distress to Messrs. VanBenthuyzen and Redvanly, and business loss/interruption to Raymond James, which closed its Atlanta investment banking offices on of January 7 and 8, 2025, out of safety concerns and to fully evaluate the security risk (and potential other risks) posed by this escalating Campaign of malicious and harassing emails being sent impersonating and/or targeting Plaintiffs and other associated with them.
11. There is also a significant likelihood that the false and damaging information spread by Defendant has impaired Raymond James' reputation in the industry, such that the company will suffer loss of business in the future.

12. The aforementioned conduct of Defendant has proximately caused significant harm and damage to Plaintiffs, which is ongoing and expected to continue unless the Court intervenes.

13. To that end, Plaintiffs further submit that they are concurrently requesting, by separate Motion, certain injunctive relief and an expedited preliminary injunction hearing to prevent immediate and irreparable injury, loss, and damage to the Plaintiffs.

## **II. THE PARTIES**

14. Plaintiff Raymond James & Associates, Inc. is a citizen of the state of Florida – being incorporated under the laws of the state of Florida and having its principal place of business in St. Petersburg, Florida.

15. Plaintiff Timothy VanBenthuyzen is an employee of Raymond James & Associates, Inc., is based in the Atlanta office, and is a citizen of the state of Georgia.

16. Plaintiff Richard Redvanly is an employee of Raymond James & Associates, Inc., is based in the Atlanta office, and is a citizen of the state of Georgia.

17. Defendant Paul T. Saba, Jr. (hereinafter “Defendant”) is a citizen of the state of Ohio and resides in Cincinnati, Ohio.

## **III. BASIS FOR JURISDICTION**

18. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. § 1332 because the suit is between citizens of different States and the value of the object of this suit is more than \$75,000.



19. Venue is proper in the Southern District of Ohio because it is where Defendant resides and where, upon information and belief, most of the harassing, defamatory, and damaging conduct originated.

#### **IV. FACTS**

20. Plaintiff Raymond James & Associates, Inc. is a public company that provides diversified financial services.
21. Plaintiffs Timothy VanBenthuyzen and Richard Redvanly are employed by Raymond James in its Healthcare Investment Banking group at Raymond James' Atlanta, Georgia office.
22. Defendant was previously a summer investment banking intern at the Atlanta, Georgia office of Raymond James. in the summer of 2024. Defendant was not assigned to the Healthcare Investment Banking group during the pendency of his internship, but rather was assigned to a different group within the same office.
23. During Defendant's internship, Mr. Redvanly was assigned to be Defendant's mentor.
24. At the conclusion of his internship, Defendant was not offered a full-time position with Raymond James. After being notified that he would not be receiving a full-time offer, Defendant sent several emails to Mr. VanBenthuyzen in August 2024 and September 2024 indicating his interest in a full-time position with the Healthcare Investment Banking group. Mr. VanBenthuyzen informed Defendant that there were no open positions but that he would keep him posted if that changed.

25. In the ensuing months, and as a direct result of his frustration at not being given a full-time offer to join the company, Defendant began an email campaign of defaming and harassing Messrs. VanBenthuyzen and Redvanly.

**Harassing, Defamatory, Abusive, and Damaging Email Attacks on Plaintiffs**

26. On November 4, 2024, Plaintiffs learned that an email was sent from a fictitious email account ([stein3350@gmail.com](mailto:stein3350@gmail.com)) and was addressed to multiple individuals at Raymond James, which included the following message<sup>1</sup> falsely accusing Mr. Redvanly of illegal insider trading:

+  
From: Frank Stein<[stein3350@gmail.com](mailto:stein3350@gmail.com)>  
To: [REDACTED]@raymondjames.com, [REDACTED]@raymondjames.com, [REDACTED]@raymondjames.com + 11 More  
Sent: Monday, November 4, 2024 at 3:24 PM EST ⓘ  
Size: 11.5 KB

All,

I hope your week is off to a great start. I am reaching out because I am friends with your colleague Richard Redvanly. He gave me inside information about the projects he is working on. In passing, he told me he has been using his mother's trading account to make a profit on the transactions he is working on. I am writing this email for you all to check in on this as a fellow neighbor.

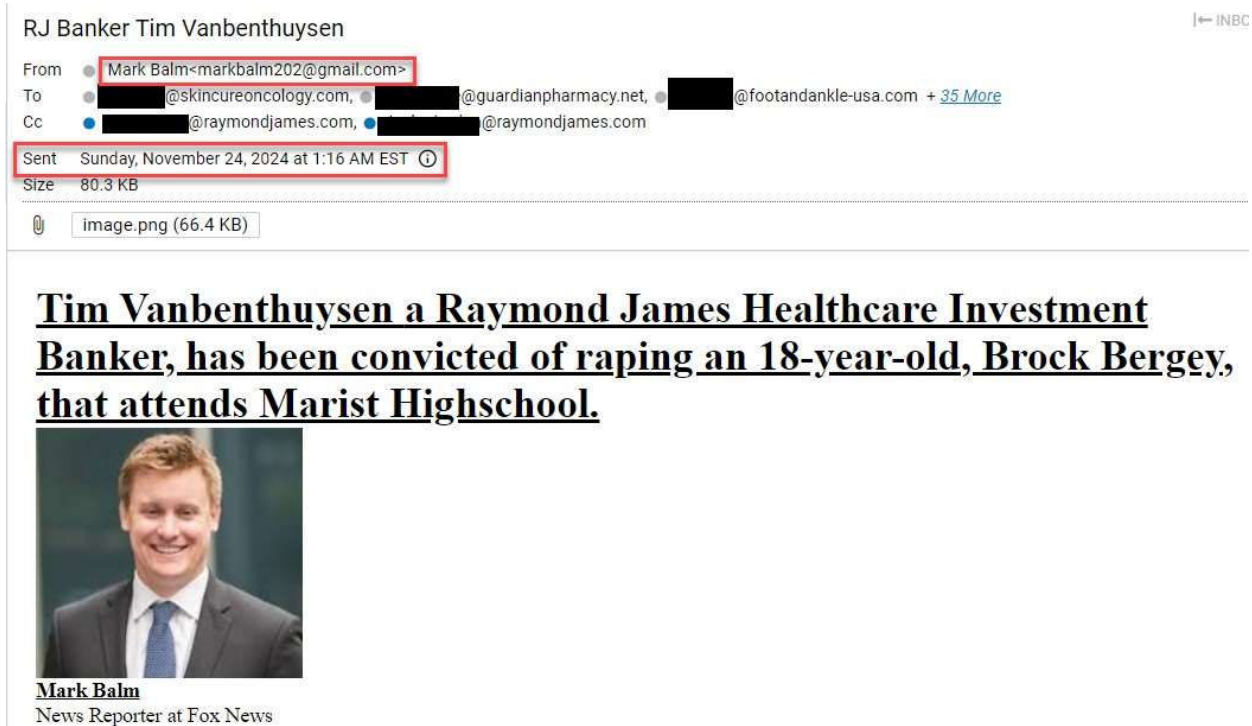
I am embarrassed to write this email about Richard, as he is a close friend of mine. I have never worked at Raymond James and have never been affiliated with them in any way.

27. On November 24, 2024, Plaintiffs learned that two emails from two separate fictitious email accounts ([markbalm202@gmail.com](mailto:markbalm202@gmail.com) and [robertsteinnews@gmail.com](mailto:robertsteinnews@gmail.com)) were sent to numerous individuals employed by Raymond James and also to individuals outside the company.

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<sup>1</sup> To protect the safety and privacy of individuals who are not Plaintiffs to this case and who otherwise merely received these emails or were targeted by them, identifying information has been redacted from these email screenshots.

28. One of the emails sent to multiple individuals on November 24, 2024 contained the following message falsely stating that Mr. VanBenthuisen had been convicted of raping an 18-year-old:



29. The other email sent on November 24, 2024 contained the following message falsely stating that Mr. Redvanly had been convicted of raping a 16-year-old:

RJ Banker Richard Redvanly

INBOUND

From: Robert Stein<robertsteinnews@gmail.com>  
To: [REDACTED]@raymondjames.com, [REDACTED]@raymondjames.com, [REDACTED]@raymondjames.com + 13 More  
Cc: [REDACTED]@radnet.com, [REDACTED]@altaris.com, [REDACTED]@waterstreet.com + 1 More  
Sent: Sunday, November 24, 2024 at 6:57 PM EST  
Size: 55.0 KB  
image.png (44.8 KB)

**Richard Redvanly, a Raymond James Investment Banker, has been convicted of raping a 16-year-old woman Hannah Hopefry at St. Vincents Academy**



**Robert Stein**

30. On or about December 1, 2024, Mr. Redvanly's girlfriend was also targeted at her place of employment, when an email was sent to other employees of her employer from the fictitious email account for "Robert Stein" with the following message that accused Mr. Redvanly's girlfriend of having engaged in insider trading.

31. Additionally, Plaintiffs learned that on December 1, 2024, an email was sent from another fictitious and impersonated email account ([gracebeckwith@outlook.com](mailto:gracebeckwith@outlook.com)) to Mr. Redvanly's girlfriend's college email address with the following message that alleged the sender of the email – someone supposedly named "Grace" – was having a romantic relationship with Mr. Redvanly:

From: Grace Beckwith <[GraceBeckwith@outlook.com](mailto:GraceBeckwith@outlook.com)>  
Date: Sun, Dec 1, 2024 at 9:07 PM  
Subject: Richard Redvanly  
To: [REDACTED]  
Dear [REDACTED]  
My name is Grace Beckwith, and I am writing to share something you have the right to know. I have been in a relationship with your boyfriend, Richard, for the past few months while you have been away at [REDACTED]  
I live in Atlanta, GA, and I want to make it clear that I wasn't aware Richard was in a relationship with you when this began. Had I known, I would never have allowed this to happen. Once I found out, I felt it was essential to be honest with you.  
I can only imagine how painful this news is, and I am genuinely sorry for any hurt this causes. I take full responsibility for my actions and deeply regret the pain this situation has created.  
Best,  
Grace Beckwith

32. On December 8, 2024, a false email thread was sent to multiple recipients both internal and external to Raymond James using Yahoo and Outlook email addresses intended to impersonate Mr. VanBenthuyzen (who is married) and another employee in order to imply that the two were having an affair.
33. The December 8, 2024 false email thread also included explicit and repulsive images and was further distributed by yet another false email account ([harrissteinfeld@yahoo.com](mailto:harrissteinfeld@yahoo.com)) to numerous members of the investment banking community at firms that compete with Raymond James and to other Raymond James employees:

Fw: Have a great week



Harris Steinfeld <harrissteinfeld@yahoo.com>

Reply Reply All Forward +50 others

Sun 12/8/2024 1:15 PM

Hello Everyone,

I am writing to bring to your attention a serious issue I have been experiencing. I have received several sexually inappropriate emails from Tim Vanbenthuyzen that were sent to a person named [REDACTED]. I somehow got CC'ed on this email and I am not so sure why as I don't know who these people are. I believe it is important to address this matter immediately. As I understand you are possible colleagues of Tim's, I am reaching out to ensure that this behavior is stopped.

Best,  
Harris Steinfeld

----- Forwarded Message -----

From: Tim Vanbenthuyzen <timvanbenthuyzen@outlook.com>  
To: [REDACTED]@myyahoo.com <[REDACTED]@myyahoo.com>  
Cc: harrissteinfeld@yahoo.com <harrissteinfeld@yahoo.com>  
Sent: Sunday, December 8, 2024 at 01:05:33 PM EST  
Subject: Have a great week

Hi Babe,

I hope you had a wonderful Saturday! I wanted to share a picture of my nutcracker with you—I think you'll love it. Hope your week is going well!

Love,  
Tim

34. On December 15, 2024, another fictitious email account ([arjunpatelphilly@outlook.com](mailto:arjunpatelphilly@outlook.com)) sent a false email to numerous individuals purporting to be reporting an explicit<sup>2</sup> communication between Mr. VanBenthuyzen and another Raymond James employee to numerous recipients both internal and external to Raymond James as follows:

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<sup>2</sup> Plaintiffs have redacted or removed the pornographic images contained in this and subsequent email communications referenced in the Complaint.

Fw: Have a great week



Arjun Patel <ArjunPatelphilly@outlook.com>

Reply Reply All Forward

To

Sun 12/15/2024 10:53 PM

Hello Everyone,

I hope this message finds you well. I am reaching out because I have been receiving disturbing emails from [REDACTED] and Tim Vanbenthuyzen at Raymond James, and I am unsure why. These messages are quite unsettling, and I kindly request that they cease immediately.

I do not know [REDACTED] and I would appreciate any assistance in resolving this matter so that I no longer receive these emails.

**If I receive this email again, I will be pressing charges. This email is truly disgusting.**

Arjun Patel

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From: [REDACTED] <[REDACTED]@myyahoo.com>

Sent: Sunday, December 15, 2024 6:05 PM

To: Tim Vanbenthuyzen <timvanbenthuyzen@outlook.com>; arjunpatelphilly@outlook.com <arjunpatelphilly@outlook.com>

Subject: Have a great week

Hi Babes,

I hope you are enjoying the weekend. Here are some photos of me last night.

35. This malicious, harassing, defamatory, abusive, and damaging conduct continued throughout the month of December 2024, during which time the anonymous attacker used multiple other impersonated email accounts to harass, defame, and falsely portray Plaintiffs in a pattern of escalating rhetoric and repulsiveness.
36. On December 21, 2024, another fictitious email account sent an email to numerous individuals internal and external to Raymond James to purportedly report that an email account impersonating Mr. VanBenthuyzen's wife had supposedly sent an explicit email, which included an explicit photo taken from the internet:

Fw: Experimentation

Jack Suffolk <jackmaguir@yahoo.com>

To: [REDACTED] +56 others

↩ Reply
↩ Reply All
➡ Forward
⋮

Sat 12/21/2024 9:48 PM

Hello Everyone,

I hope you are having a great Saturday. I am emailing all of you because you are Tim's colleagues. I don't know why I received this email from Raymond James Healthcare Director Tim Vanbenthuyssen. I am not one of the "the guys" as mentioned in [REDACTED]'s email. I don't know who [REDACTED] is. Please advise the content of this email is very graphic. Additionally, please don't send this email to me again.

Best,  
Jack Maguir

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----- Forwarded Message -----

From: Tim Vanbenthuyssen <timvanbenthuyssen@outlook.com>  
 To: Jack Maguir <jackmaguir@yahoo.com>  
 Sent: Saturday, December 21, 2024 at 08:33:06 PM EST  
 Subject: Fw: Experimentation

Sounds great honey.

Jack will be able to make the event tonight at 10:00 PM? We had to push it back a bit because we have to get the kiddos to bed.

Hope to see you there.

Best,  
Tim

**Tim Vanbenthuyssen**  
 Healthcare Investment Banking Director | Raymond James

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From: [REDACTED] <[REDACTED]@yahoo.com>  
 Sent: Sunday, December 22, 2024 1:30 AM  
 To: timvanbenthuyssen@outlook.com <timvanbenthuyssen@outlook.com>; jackmaguir@yahoo.com <jackmaguir@yahoo.com>  
 Subject: Experimentation

Hey Honey,

I am currently driving home from my Mom's house I saw an image online that I would like to experiment with the guys tonight. Below is the image. Let me know what you think.

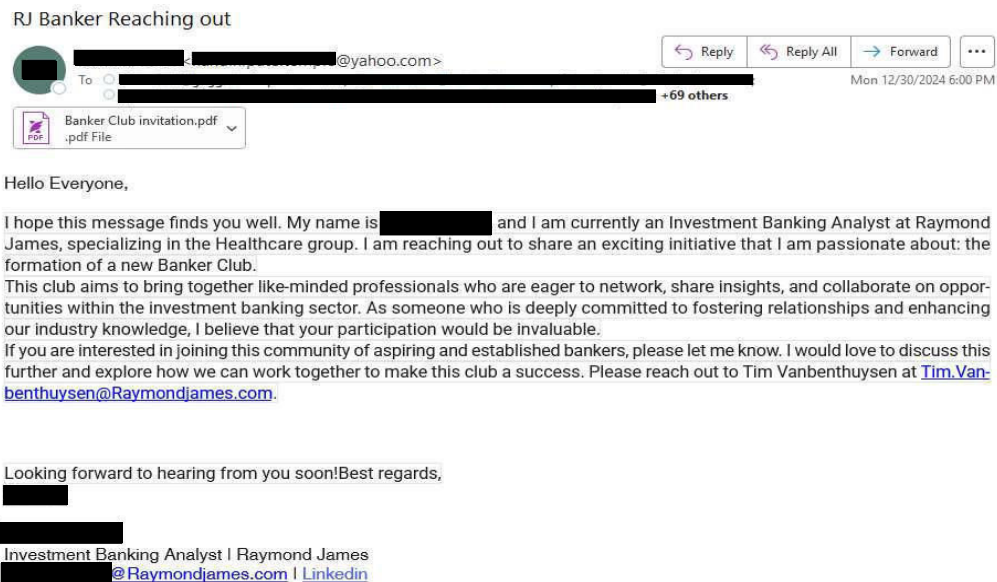
37. As a result of this barrage of emails, and additional emails discussed below, and the security threats they posed, Raymond James made the decision to close its Atlanta investment banking office on January 7 and 8, 2025, which caused a significant business loss and interruption.
38. As a result of the Defendant's conduct, Plaintiffs' reputations – both as professionals and personally – have been greatly damaged.
39. As a result of the Defendant's false and malicious email campaign, Plaintiffs have had to expend significant financial resources and efforts to repair the damage to their reputations.
40. As a result of the Defendant's conduct, Plaintiffs have had to expend significant financial resources to determine the source of the false emails, evaluate the extent



of damage they caused, and take appropriate steps to ensure the safety of its employees.

**Plaintiffs Discover the Perpetrator's Identity**

41. On December 30, 2024, another email account impersonating an investment banking employee that was with Raymond James until very recently sent an email, which invited numerous recipients external to Raymond James, including numerous other investment bankers who compete with the Plaintiffs, business contacts, and prospective clients, to join a bogus Neo-Nazi club for bankers:



42. The December 30, 2024 email invited responses to Mr. VanBenthuyzen's actual email address with Raymond James and attached the following PDF file:



## **NEO-NAZI Banker Club**

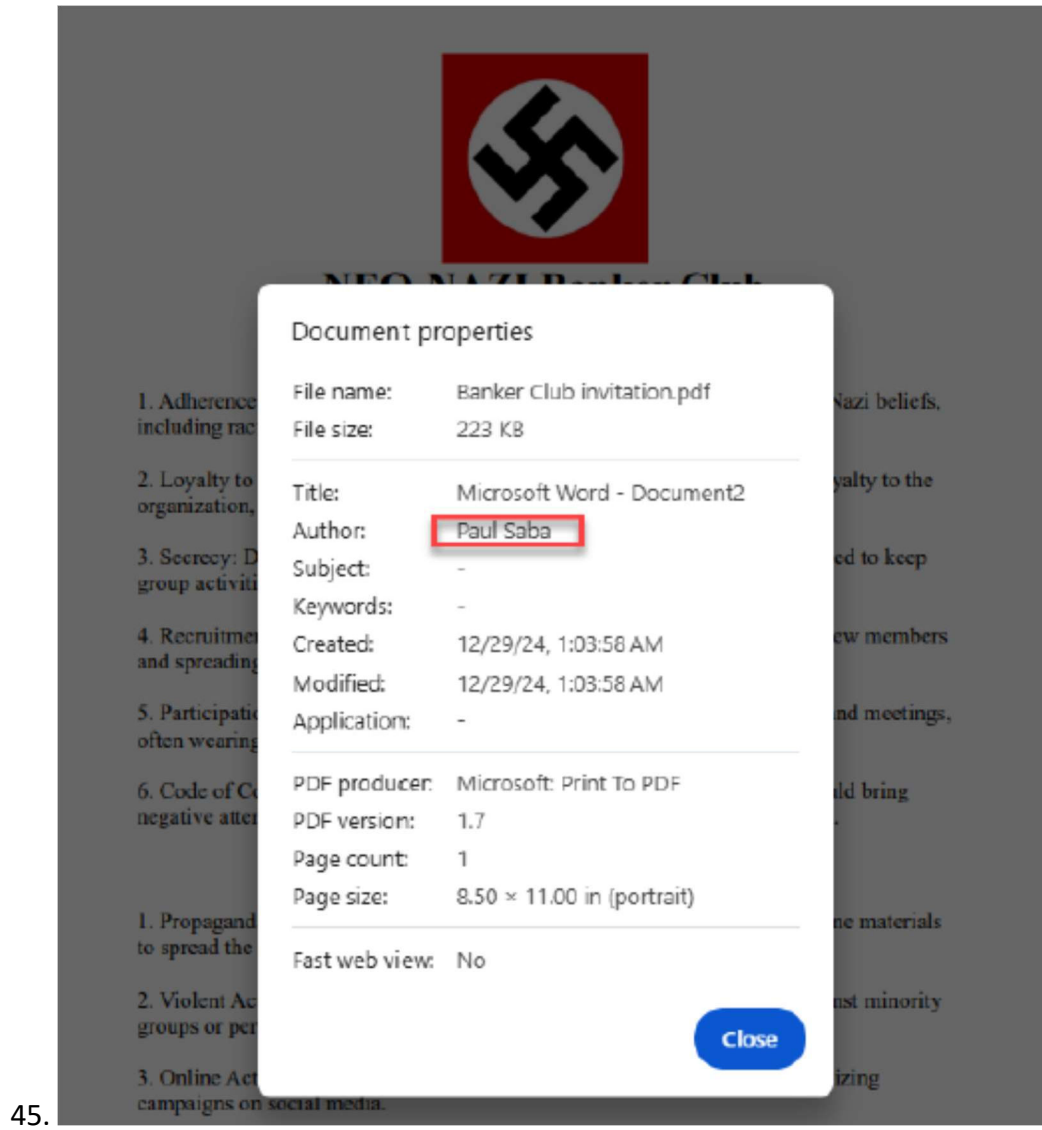
### **Rules and Expectations**

1. Adherence to Ideology: Members are required to adopt and promote Neo-Nazi beliefs, including racial superiority, anti-Semitism, and homophobia.
2. Loyalty to the Group: Members are often expected to show unwavering loyalty to the organization, its leaders, and its ideology.
3. Secrecy: Due to legal and social consequences, members are often instructed to keep group activities, identities, and objectives secret.
4. Recruitment and Indoctrination: Members may be tasked with recruiting new members and spreading the group's propaganda.
5. Participation in Events: Members are expected to attend rallies, marches, and meetings, often wearing symbols or uniforms associated with the movement.
6. Code of Conduct: Members are typically required to avoid actions that could bring negative attention to the group, although this can vary between organizations.

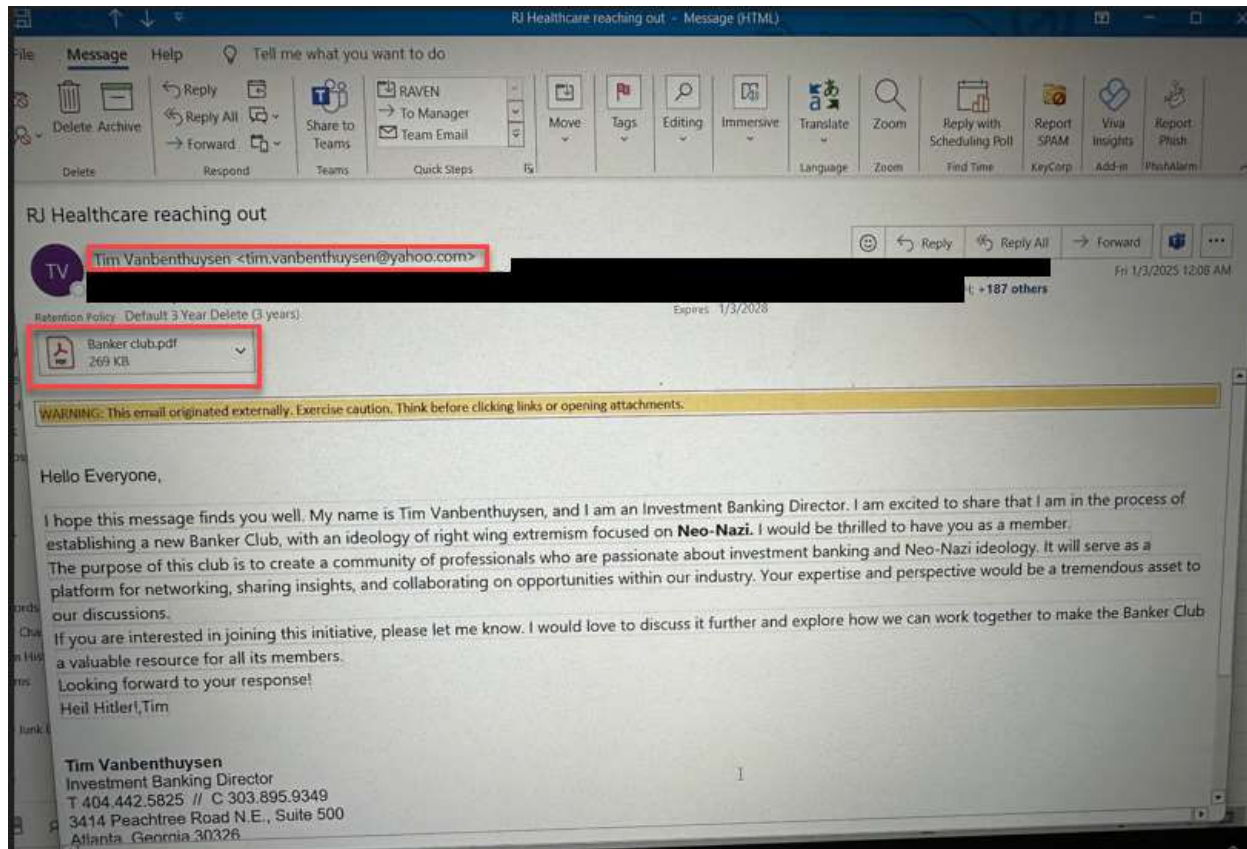
### **Common Tasks and Activities**

1. Propaganda Distribution: Members may distribute flyers, posters, and online materials to spread the group's messages.
2. Violent Actions: Some groups encourage or participate in violent acts against minority groups or perceived enemies.
3. Online Activity: Members might engage in spreading hate speech or organizing campaigns on social media.
4. Fundraising: Members may be tasked with raising funds for the group through events, merchandise sales, or donations.
5. Training: Some groups provide paramilitary training, including weapons handling and combat techniques.
6. Networking: Members work to establish alliances with other like-minded groups or individuals.

43. While deplorable and damaging in its content, this December 30, 2024 email finally provided the RJ Cyber Threat Center with an opportunity to learn the identity of the perpetrator of this Campaign of harassing, defamatory, abusive, and damaging attacks.
44. The metadata for the PDF attachment to the December 30, 2024 email shows that it was created on December 29, 2024 and that the author of the Neo-Nazi Banker Club invitation is "Paul Saba", the Defendant:



46. On January 3, 2025, Defendant sent a similar Neo-Nazi themed email from another false, impersonated account ([tim.vanbenthuyzen@yahoo.com](mailto:tim.vanbenthuyzen@yahoo.com)), which contained the following message:



47. Similar to the PDF attachment to the December 30, 2024 email, the metadata to the “Banker club.pdf” attachment to the January 3, 2025 email indicated that the author of the Neo-Nazi Banker club invitation was the Defendant, Paul Saba.
48. But that was not the only direct evidence tying the Defendant to this horrendous Campaign. After receiving copies of the emails from some of the external recipients, the RJ Cyber Threat Center discovered that the recovery phone number listed for the fictitious [tim.vanbenthuyzen@yahoo.com](mailto:tim.vanbenthuyzen@yahoo.com) email account, as shown on the website, are “(5\*\*) \*\*\*.\*\*10.”
49. The RJ Cyber Threat Center compared the visible digits from the recovery phone number for the [tim.vanbethuyzen@yahoo.com](mailto:tim.vanbethuyzen@yahoo.com) account to the phone number listed on the resume that Defendant submitted to Raymond James several months

earlier following his completion of the summer intern program, which indicated a match of those numbers:

## Paul T. Saba Jr

tsaba@iu.edu (513) 801-7110

### EDUCATION & HONORS

Indiana University, Kelley School of Business | Bloomington, IN  
Bachelor of Science in Business | Major: Finance

#### Honors and Distinctions:

- **Kelley Honors Program:** Faculty-selected for honors
- **Hutton Honors College:** Sophisticated honors curriculum
- **Founders Scholar:** Recognized for sustained academic achievement
- **Dean's Scholarship:** Awarded merit-based scholarship

Investment Banking Seminar | Bloomington, IN

#### Peer Mentor

- Conducted weekly private sessions to address mentees goals, prepare them for interviews, and provide networking advice
- Mentored 15 individuals, offering feedback on soft skills and providing preparations for finance technical interviews
- Tasked with conducting and assessing 50+ technical and behavioral interviews for potential "IBS" class of 2026 candidates

#### Participating Member

- Faculty-selected to participate in a rigorous program focused on preparing students for careers in finance
- Trained in valuation techniques and financial modeling through weekly lectures and Training the Street seminar

yahoo!

timvanbenthuyesen@yahoo.com

Select an option  
to sign in to your account

Email  
Get a code at h\*\*\*\*\*ld@yahoo.com

WhatsApp  
Get a code on (513) 801-7110

Text message  
Get a code on (513) 801-7110 Message  
and data rates may apply

May 2025  
GPA: 3.75 / 4.00

less than 10% acceptance  
among undergraduate freshmen  
maintenance of 3.80 GPA or above  
emplary high school achievement

May 2024 - Present

December 2023 - Present

50. As the RJ Cyber Threat Center continued to assess the source of the harassing emails from the fictitious accounts, additional data points linked Defendant to other messages sent as part of the coordinated and wide-reaching email Campaign against the Plaintiffs.

51. For example, the recovery email address for the [tim.vanbenthuyesen@yahoo.com](mailto:tim.vanbenthuyesen@yahoo.com) is listed as "[h\\*\\*\\*\\*\\*ld@yahoo.com](mailto:h*****ld@yahoo.com)," which contains visible letters matching the [harrissteinfeld@yahoo.com](mailto:harrissteinfeld@yahoo.com) address, which was used as part of the Campaign to send a false, harassing, defamatory, abusive, and damaging email about Plaintiffs on December 8, 2024.

52. Another email address used in the Campaign to impersonate Mr. VanBenthuyesen in a subsequent January 6, 2025 email was [timvanbenthuyesen.rj@yahoo.com](mailto:timvanbenthuyesen.rj@yahoo.com). The recovery email address for the [timvanbenthuyesen.rj@yahoo.com](mailto:timvanbenthuyesen.rj@yahoo.com) email address is listed as "[t\\*\\*\\*\\*\\*en@outlook.com](mailto:t*****en@outlook.com)," which contains matching lettering and ordering as the [tim.vanbenthuyesen@outlook.com](mailto:tim.vanbenthuyesen@outlook.com) email address which was used as part of the

Campaign as the source of a false, harassing, defamatory, abusive, and damaging email about Plaintiffs on December 8, 2024.

53. This showed that multiple email accounts used as part of the harassing, defamatory, abusive, and damaging Campaign against Plaintiffs were connected to each other and that at least one of the email accounts was linked to a recovery phone number that appeared to match Defendant's phone number.
54. On January 6, 2025, another "Neo-Nazi banking club invitation" email with a "NEO-NAZI BANKER CLUB.pdf" attachment was again sent to approximately 202 third-party email addresses from an email purporting to be Plaintiff Timothy VanBenthuyzen. Similar to the PDF attachment to the December 30, 2024 email and the January 3, 2025 email, the metadata for the "NEO-NAZI BANKER CLUB.pdf" attachment to the January 6, 2025 email indicated that the author of the Neo-Nazi Banker club invitation was Defendant "Paul Saba".
55. On January 6, 2025, Raymond James' Head of Litigation sent a Cease & Desist Letter to the Defendant by email (and sent the same letter by UPS the next day), demanding that he immediately cease and desist his email campaign intended to harm, defame, and/or impersonate Raymond James employees and individuals associated with the company. (See 1/6/25 Cease and Desist Letter to Paul T. Saba, Jr., attached hereto as Exhibit A).
56. Defendant confirmed by phone in the evening of January 6 that he received the Cease & Desist Letter.
57. Notably, Plaintiffs are not aware of any email attacks since Defendant confirmed in the evening of January 6, 2025 that he received the Cease & Desist Letter – that



was the first time the Defendant was informed that he had been exposed as the perpetrator of the malicious Campaign.

**FIRST CAUSE OF ACTION – DEFAMATION**

58. Plaintiffs incorporate by reference the allegations contained in Paragraphs 1 through 57 above as if fully restated herein.

59. As described above, Defendant made and distributed statements concerning Plaintiffs that he knew to be false when he made them.

60. The false statements knowingly made by Defendant were intended to cause harm and, in fact, did cause harm.

61. Defendant's conduct of distributing emails containing false information concerning Plaintiffs was done maliciously.

62. As a proximate cause of Defendant's actions, Plaintiffs suffered and will continue to suffer substantial harm to their reputation.

**SECOND CAUSE OF ACTION – CIVIL LIABILITY FOR DAMAGES RESULTING FROM DEFENDANT'S CRIMINAL CONDUCT OF TELECOMMUNICATIONS HARASSMENT (PURSUANT TO R.C. 2307.60 AND 2917.21)**

63. Plaintiffs incorporate by reference the allegations contained in Paragraphs 1 through 62 above as if fully restated herein.

64. As described above, Defendant violated R.C. 2917.21 when he distributed false emails from impersonated accounts that were intended to abuse, threaten, and/or harass Plaintiffs.

65. Defendant's conduct proximately caused substantial damage to Plaintiffs, both to their reputation and person, but also in the loss of business and/or business

interruption when Plaintiffs were forced to temporarily close the Atlanta office of Raymond James & Associates, Inc.

**THIRD CAUSE OF ACTION – FALSE LIGHT**

66. Plaintiffs incorporate by reference the allegations contained in Paragraphs 1 through 65 above as if fully restated herein.
67. Defendant's actions to produce and distribute knowingly false information concerning Plaintiffs by email was intended to place Plaintiffs in a false light with their colleagues, family, friends, professional contacts, prospective clients, and persons within the investment banking industry.
68. Defendant knew that the emails he manufactured and distributed contained false information and were sent from email accounts falsely represented as belonging to Plaintiffs and/or other individuals.
69. There was no legitimate or justifiable basis for Defendant to have created and distributed the emails.
70. Defendant acted with reckless disregard for the falsity of the publication and distribution of the information by email and did so intentionally to make it appear that Plaintiffs and/or their significant others were engaged in deplorable, morally repugnant, and/or illegal behavior.
71. Defendant's actions as described above were done willfully, maliciously, deliberately, and purposely with the intention of causing harm to Plaintiffs.
72. As a result of Defendant's actions, Plaintiffs have suffered and will continue to suffer damages in an amount to be determined at trial.



**FOURTH CAUSE OF ACTION – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

73. Plaintiffs incorporate by reference the allegations contained in Paragraphs 1 through 72 above as if fully restated herein.

74. Defendant's conduct in distributing false emails containing defamatory information about Plaintiffs was and is extreme and outrageous.

75. Defendant's conduct was intentional and designed to harm Plaintiffs both professionally and personally.

76. Defendant's actions as described above were done willfully, maliciously, deliberately, and purposely with the intention of inflicting emotional harm upon Plaintiffs.

77. Defendant's actions were done with reckless disregard of the probability of causing Plaintiffs emotional distress, and these acts did, in fact, cause emotional distress.

78. As a result of Defendant's actions, Plaintiffs have suffered and will continue to suffer damages in an amount to be determined at trial.

WHEREFORE, Plaintiffs seek judgment against Defendant as follows:

- For defamation, an amount to be determined at trial but presently believed to exceed \$75,000;
- For civil damages proximately caused by Defendant's criminal conduct, *to wit*, telecommunications harassment, an amount to be determined at trial but presently believed to exceed \$75,000;
- For false light, an amount to be determined at trial but presently believed to exceed \$75,000;

- For intentional infliction of emotional distress, an amount to be determined at trial but presently believed to exceed \$75,000.
- For an award of punitive damages;
- For an order permitting Plaintiffs to recover their attorney fees and costs incurred with bringing this action.

Respectfully submitted,

/s/ Ian D. Mitchell  
Ian D. Mitchell, Esq. (0090643)  
Andy J. Dorman, Esq. (0063410)  
REMINER CO., LPA  
525 Vine St., Suite 1500  
Cincinnati, OH 45202  
T: 513-721-1311  
F: 513-721-2553  
E-mail: [IMitchell@reminger.com](mailto:IMitchell@reminger.com)  
[ADorman@reminger.com](mailto:ADorman@reminger.com)  
***Counsel for Plaintiffs***

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of Georgia and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at Atlanta, Georgia this 9<sup>th</sup> day of January, 2025.



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Timothy VanBenthuyzen  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Richard Redvanly  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Steve Hufford  
Raymond James & Associates, Inc.



**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Timothy VanBenthuyzen  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of Georgia and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at Thursday, January this 9 day of January, 2025.

Richard A. Redvanly

Richard Redvanly  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Steve Hufford  
Raymond James & Associates, Inc.



**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Timothy VanBenthuyzen  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of \_\_\_\_\_ and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at \_\_\_\_\_, \_\_\_\_\_ this \_\_\_\_ day of January, 2025.

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Richard Redvanly  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of Georgia and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at Atlanta, Georgia this 10th day of January, 2025.



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Steve Hufford  
Raymond James & Associates, Inc.

**VERIFICATION**

I declare under penalty of perjury under the laws of the State of Florida and the United States of America that I have read the foregoing Complaint, know the contents thereof, and believe them to be true and correct.

DATED at St. Petersburg, Florida this 10th day of January, 2025.



Aaron Gellman  
Raymond James & Associates, Inc.

**JURY DEMAND**

Now come the Plaintiffs and hereby request a jury to hear all of the issues of this case.

/s/ **Ian D. Mitchell**  
Ian D. Mitchell (0090643)